

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

----- X  
In re : Chapter 9  
: Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, :  
: Hon. Thomas J. Tucker  
Debtor :  
----- X

**NOTICE OF DEBTOR'S SIXTEENTH OMNIBUS  
OBJECTION TO CERTAIN CLAIMS**

**(Books and Records Claims)**

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS  
HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR  
CLAIM(S).**

**PLEASE TAKE NOTICE THAT** the City, by and through its undersigned counsel, has filed an objection to certain books and records claims (the “Sixteenth Omnibus Objection”) and for an order modifying such claims.

**YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED.**  
**PURSUANT TO FED. R. BANKR. P 3007(e)(1) AND PRIOR ORDERS OF THIS**  
**COURT. YOU SHOULD REVIEW EXHIBIT 2 OF THE SIXTEENTH OMNIBUS**  
**OBJECTION TO FIND YOUR NAME AND CLAIM. YOU SHOULD READ THESE**  
**PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU**  
**HAVE ONE.**

If you do not want the court to eliminate or change your claim, or grant the relief request in the Sixteenth Omnibus Objection, then on or before **May 20, 2015**, you or your lawyer must:

1. File with the court, at the address below, a written response to the objection. Unless a written response is filed and served by the date specified, the court may decide that you do not oppose the objection to your claim.

Clerk of the Court  
United States Bankruptcy Court  
211 W. Fort Street, Suite 2100  
Detroit, MI 48226

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. All attorneys are required to file pleadings electronically.

2. A copy of your response must also be mailed to counsel for the City:

John A. Simon  
Jeffrey S. Kopp  
Tamar N. Dolcourt  
Leah R. Imbrogno  
Foley & Lardner LLP  
500 Woodward Ave., Ste. 2700  
Detroit, MI 48226

3. You must also attend the hearing on the objection scheduled to be held on **May 27, 2015** at 1:30 p.m. in Courtroom 1925, 211 W. Fort Street, Detroit, MI 48226 unless your attendance is excused by mutual agreement between yourself and the objector's attorney.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim, in which event the hearing will be canceled and the objection sustained.**

Date: April 23, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon  
John A. Simon (P61866)  
Jeffrey S. Kopp (P59485)  
Tamar N. Dolcourt (P73425)  
Leah R. Imbrogno (P79384)  
500 Woodward Ave., Ste. 2700  
Detroit, MI 48226  
313.234.7100  
jsimon@foley.com  
jkopp@foley.com  
tdolcourt@foley.com  
limbrogno@foley.com

*Counsel for the Debtor, City of Detroit,  
Michigan*